

***QUIJANO ENNIS & SIDERIS***

ATTORNEYS AT LAW

40 FULTON STREET

Floor 23

NEW YORK, NEW YORK 10038

TELEPHONE: (212) 686-0666

**Peter Enrique Quijano Cell: (917) 716-6312**

FAX: (212) 686-8690

[peter@qandelaw.com](mailto:peter@qandelaw.com); [nancylecennis@gmail.com](mailto:nancylecennis@gmail.com); [annasideris@yahoo.com](mailto:annasideris@yahoo.com)

Peter Enrique Quijano  
Nancy Lee Ennis  
Anna N. Sideris

April 20, 2020

**BY ECF**

Honorable John G. Koeltl  
United States District Judge  
for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Application granted.  
SO ORDERED.

New York, NY /s/ John G. Koeltl  
April 20, 2020 John G. Koeltl, U.S.D.J.

**Re: U.S. v. TIMOTHY MITCHELL, 19 Cr. 843 (JGK)**

Dear Judge Koeltl:

I am the attorney for the defendant Timothy Mitchell in the above-referenced matter. Mr. Mitchell is charged with being Felon in possession of firearm, in violation of 18 U.S.C. § 922 (g)(1). Motions are currently scheduled for April 24, 2020; Replies by May 18, 2020; and Response by May 8, 2020. The purpose of this letter is to respectfully request that the Court re-schedule the Schedule for Defense Motions to May 15, 2020; Replies by June 5, 2020; and Response by May 29, 2020. The **government has no objection to this request.**

The Defendant Timothy Mitchell is detained at the MCC-New York. As a result of the COVID-19 crisis, there have been no legal visits at the MCC-New York in approximately the last 30 days; and inmates have been in a “lock-down,” with very limited access to telephones. Legal calls must be scheduled by the attorney in advance; and have been limited to approximately 15-20 minutes. This has severely impacted our ability to confer with Mr. Mitchell regarding the anticipated pre-trial motions. As a result, we need additional time to finalize the Defendant’s pre-trial motion. We have conferred with Assistant United States Attorney Ni Qian, and we understand that the **government has no objection** to the request to adjust the current pre-trial motion schedule.

Honorable John G. Koeltl, U.S.D.J.  
April 20, 2020

Accordingly, I respectfully request, **without government objection**, that the Court re-schedule the Pre-trial Motions in U.S. v. Timothy Mitchell, 19 Cr. 843 (JGK) as follows: Defense Motions by May 15, 2020; Defense Reply by June 5, 2020; and government's Response by May 29, 2020.

Your Honor's attention to and consideration of this request are, as always, greatly appreciated.

Respectfully submitted,

*Peter Enrique Quijano*

Peter Enrique Quijano

cc: A.U.S.A Ni Qian by email & ECF ([Ni.Qian@usdoj.gov](mailto:Ni.Qian@usdoj.gov))  
Megan Wall-Wolff, Esquire (by email [mwallwolff@wallwolff.com](mailto:mwallwolff@wallwolff.com))  
Anna N. Sideris, Esquire (by email [annasideris@yahoo.com](mailto:annasideris@yahoo.com))